

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

FILED
JAN 20 2009
MAGISTRATE JUDGE P. MICHAEL MAHONEY
United States District Court

UNITED STATES OF AMERICA

vs.

RAUL RAYGOZA,
CESAR N. SANCHEZ,
CRISTOBAL PEREZ,
JUAN ESPINOZA, and
ABIGAIL BERRONES

)
)
) No. 08 CR 50051
) Magistrate Judge P. Michael Mahoney
) (Judge Philip G. Reinhard)
)
)
)
)

PROTECTIVE ORDER

Upon the agreed motion of the United States for a protective order, it is hereby ordered as follows:

1. All materials produced by the government in preparation for or in conjunction with any stage of the proceedings in this case, including but not limited to grand jury transcripts, agency reports, witness statements, memoranda of interview, and any documents provided by the government, excluding trial exhibits, remain the property of the United States. Within 30 days following the later of sentencing, conclusion of an appeal, or an earlier resolution of charge(s) against the defendant, all such materials and all copies made thereof shall be returned to the United States without further order of Court. All material returned shall be segregated and preserved by the United States for a period of two years after sentencing or an earlier resolution of the charge(s) against the defendant.

2. All materials provided by the United States may be utilized by defendant and his counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding. The materials and their contents shall not be disclosed either directly or indirectly to any person or entity other than defendant, defendant's counsel, persons employed to assist in the defense, or such other persons as to whom the Court may authorize disclosure. Any


notes or records of any kind that defense counsel or any other recipient may make relating to the contents of materials provided by the government shall not be disclosed to anyone other than the defendant, defense counsel, and persons employed to assist in the defense, or such other person as to whom the Court may authorize disclosure, and all such notes and records shall not be disclosed except as provided by this Order.

3. The materials shall not be copied or reproduced by defense counsel or any other recipient, except as necessary to provide copies of the materials for use by defense counsel, defendant and such persons as are employed by them to assist in the defense. Such copies and reproductions shall be treated in the same manner as the original matter.

4. Prior to providing or disclosing any of the materials to any recipient, defense counsel shall provide a copy of this Order to each recipient and shall advise each recipient that at the conclusion of this case, the materials must be returned to defense counsel. All individuals and entities receiving these materials from defense counsel shall be subject to this Order and shall not further disclose the materials or their contents except as permitted by this Order or any further order of this Court. Defense counsel shall maintain a copy of this Order that has been signed and dated by each recipient who received any materials subject to this Order.

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

ENTER:


P. MICHAEL MAHONEY
UNITED STATES MAGISTRATE JUDGE

DATE: _____


Agreed and Jointly submitted by:

JERRY A. LUND
Attorney for Defendant Raul Raygoza

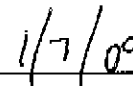
DATE

MICHAEL J. PHILLIPS
Attorney for Defendant Cesar Sanchez


DATE




HANEEF L. OMAR
Attorney for Defendant Cristobal Perez



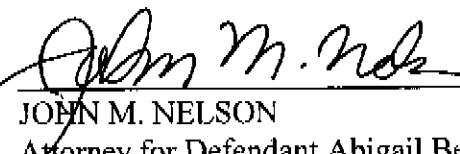
DATE



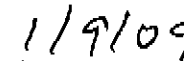

DAVID J. BROWN
Attorney for Defendant Juan Espinoza



DATE




JOHN M. NELSON
Attorney for Defendant Abigail Berrones

DATE



MONICA V. MALLORY
Assistant United States Attorney



DATE

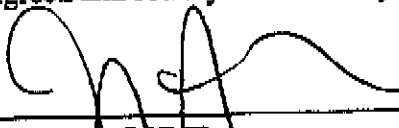
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UNITED STATES MAGISTRATE JUDGE

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JERRY A. LUND
Attorney for Defendant Raul Raygoza

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MICHAEL J. PHILLIPS
Attorney for Defendant Cesar Sanchez

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HANEEF L. OMAR
Attorney for Defendant Cristobal Perez

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DAVID J. BROWN
Attorney for Defendant Juan Espinoza

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JOHN M. NELSON
Attorney for Defendant Abigail Berrones

DATE



MONICA V. MALLORY
Assistant United States Attorney

12/29/08
DATE

5. Violation of this Order may result in the imposition of civil and criminal sanctions.

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DATE: _____

P. MICHAEL MAHONEY
UNITED STATES MAGISTRATE JUDGE

Agreed and Jointly submitted by:

JERRY A. LUND
Attorney for Defendant Raul Raygoza

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JEFF J. HECKINGER
Attorney for Defendant Cesar Sanchez

1-12-09
DATE

HANEEF L. OMAR
Attorney for Defendant Cristobal Perez

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DAVID J. BROWN
Attorney for Defendant Juan Espinoza

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JOHN M. NELSON
Attorney for Defendant Abigail Berrones

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MONICA V. MALLORY
Assistant United States Attorney

1-13-09
DATE